

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Federal-Mogul - Removal Polrep  
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** **POLREP #4**  
**Final POLREP**  
**Federal-Mogul**  
**C5G8**  
**Detroit, MI**  
**Latitude: 42.3907280 Longitude: -82.9884710**

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**From:** Brian Kelly, OSC

**Date:** 8/5/2013

**Reporting Period:**

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5G8	<b>Contract Number:</b>	
<b>D.O. Number:</b>	058	<b>Action Memo Date:</b>	1/29/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/15/2013	<b>Start Date:</b>	4/15/2013
<b>Demob Date:</b>	8/5/2013	<b>Completion Date:</b>	8/5/2013
<b>CERCLIS ID:</b>	MIN000510764	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	MDEQ
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

### Incident Category

CERCLA Time-Critical Removal

### Site Description and Location

The Federal-Mogul cleanup was located along the boundary of the former Federal-Mogul property addressed at 11031 Shoemaker Street, Detroit, Michigan 48213. The former Federal-Mogul property is 14-acres, abandoned, and shows a history of vandalism. Along its boarder to the west are 33 residential parcels which were the focus of the cleanup.

Region 5 considered this site to be a high-priority potential EJ area of concern.

### **Description of Threat and Assessments**

Federal-Mogul Corporation owned 11031 Shoemaker Street from 1946 to 1971. Erwin Trucking and RPM Distributing owned the property in 1981. Sanborn maps show the facility was demolished in 1998.

In 2003, the Traverse Group conducted a Phase I Environmental Site Assessment for the city of Detroit Department of Environmental Affairs (DEA). The report concluded the site was operated as an industrial facility by Federal-Mogul Corporation, Bower Bearing Manufacturers, and Ernst Realty Company/Ernst Fuel & Supply Company from 1925 until the 1970s.

In 2006, 13 soil samples were collected upwind and downwind of 11031 Shoemaker Street for the Michigan DEQ Detroit Lead Assessment Project. Of the 13 samples collected, only 2 were found to be greater than 400 mg/kg of lead in soil; the average was 183 mg/kg. In addition, the city of Detroit DEA contracted Camp Dresser & McKee to perform a Phase II Environmental Site Assessment (ESA) on the 11031 Shoemaker Street property. The Phase II data showed analytical results for 63 lead samples, only 6 were found to be greater than 400 mg/kg and the average was 197 mg/kg.

The 2006 final report stated "...Because lead concentrations downwind and on-site were not indicative of smelting operations, no further action is recommended at the site related to lead concentrations above Residential/Commercial I Direct Contact Criteria."

In 2008, a Notice of Corrective Action was recorded with the Wayne County Register of Deeds (Document No. 2008.348947) for the former Federal-Mogul property indicating that a corrective action (MDEQ Reference No.: NCA-RRD-213-08-003) was completed by the Federal-Mogul Corporation. The corrective action addressed hazardous substances including polynuclear aromatics, trichloroethylene, and polychlorinated biphenyl that were released from an underground storage tank farm at the site. The corrective action removed all 10 USTs and approximately 4,240 tons of contaminated soil. The Notice of Corrective Action states that soil contamination remains present at levels on the site that do not allow for unrestricted use of the property within the area of the UST cleanup.

In 2011, ASTI Environmental for Shoemaker Industrial Park, an investment group, conducted another Phase II on the 11031 Shoemaker Street property. The assessment collected 41 soil borings, only 7 were found to be greater than 400 mg/kg and the average was 214 mg/kg of lead in soil.

In 2012, EPA Remedial collected samples and conducted x-ray fluorescence (XRF) screening at 10 residential homes along the western property line of 11031 Shoemaker Street. The sampling found lead levels in soil above the 400 mg/kg residential direct contact criteria in 9 of 10 yards; the average was 676 mg/kg.

### **Conclusion**

While the Detroit Lead Assessment Project's aerial deposition study did not indicate a wide spread off-site release, the site history and EPA's Remedial investigation indicate the lead contamination in

residential yards directly abutting the property migrated there from Federal-Mogul operations through localized cross contamination, soil migration, or process exhaust.

## 2. Current Activities

### 2.1 Operations Section

#### Response Actions to Date

On April 15, EPA initiated a removal action to mitigate the threats posed by lead above 400 mg/kg in residential yards by removing and replacing soil from the residential yards.

Between April 15 and August 5, 2013, EPA removed 3,000 tons of contaminated soil and debris from the site for offsite disposal. Waste was shipped to Republic Services at Carleton Farms Landfill, 28800 Clark Road, New Boston, MI 48164

Air monitoring was conducted throughout the project, no elevated readings occurred.

Prior to the cleanup, EPA held two public meetings, canvassed the area multiple times, and hand delivered two factsheets.

#### Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Currently Federal-Mogul is the only identified PRP for the site. Federal-Mogul entered bankruptcy under Chapter 11 on November 8, 2007.

<b>R5 Priorities Summary</b>	
Miles of river systems cleaned and/or restored	0
Cubic yards of contaminated sediments removed and/or capped	0
Gallons of oil/water recovered	0
Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Acres Protected	10
Number of contaminated residential yards cleaned up	33
Human Health Exposures Avoided	100

Number of workers on site	11
Contaminant(s) of Concern	
Lead	

## 2.2 Planning Section

### Anticipated Activities and Next Steps

None

### Status

Total Parcels = 33

Parcels Sampled = 33

Parcels above 400 mg/kg = 24

Tons of lead impacted soil shipped for disposal = 3,000

Site Restoration = 100%

Estimated completion of project = 100%

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$850,000.00	\$722,000.00	\$128,000.00	15.06%
TAT/START	\$40,000.00	\$35,000.00	\$5,000.00	12.50%
<b>Intramural Costs</b>				
USEPA - Direct	\$50,000.00	\$35,000.00	\$15,000.00	30.00%

<b>Total Site Costs</b>	\$940,000.00	\$792,000.00	\$148,000.00	15.74%
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\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

No information available at this time.

## 4. Personnel On Site

U.S. EPA (1)

START - Weston Solutions Inc (1)

ERRS - Lata-Kemron (2)

- CMC (4)

- Marine Pollution Control (MPC) (4)

## 5. Definition of Terms

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

DEA - City of Detroit Department of Environmental Affairs

EPA - United States Environmental Protection Agency

ESA - Environmental Site Assessment

MDEQ - Michigan Department of Environmental Quality

PRP - Potential Responsible Party

UST - Underground Storage Tank

XRF - X-Ray Fluorescence

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

[http://www.epaosc.org/site/site\\_profile.aspx?site\\_id=8195](http://www.epaosc.org/site/site_profile.aspx?site_id=8195)

### 6.2 Reporting Schedule

## 7. Situational Reference Materials

No information available at this time.